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*Attorneys for Plaintiff, The Bank of New York Mellon F/K/A The Bank of New York as Successor
to JP Morgan Chase Bank, Not Individually But Solely as Trustee for the Holder of the Bear
Stearns ALT-A Trust 2004-11, Mortgage Pass-Through Certificates, Series 2004-11*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 THE BANK OF NEW YORK MELLON
13 F/K/A THE BANK OF NEW YORK AS
14 SUCCESSOR TO JP MORGAN CHASE
15 BANK, NOT INDIVIDUALLY BUT
16 SOLELY AS TRUSTEE FOR THE HOLDER
17 OF THE BEAR STEARNS ALT-A TRUST
18 2004-11, MORTGAGE PASS-THROUGH
19 CERTIFICATES, SERIES 2004-11,

20 Plaintiff,

21 vs.

22 STEWART INFORMATION SERVICES
23 CORP.; STEWART TITLE GUARANTY
24 COMPANY; DOE INDIVIDUALS I through
25 X; and ROE CORPORATIONS XI through
26 XX, inclusive,

27 Defendants.

Case No.: 2:21-cv-01492-RFB-DJA

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO
RESPOND TO OPPOSITION TO
MOTION FOR REMAND [ECF No. 24]**

[First Request]

23 COMES NOW Plaintiff, The Bank of New York Mellon F/K/A The Bank of New York
24 as Successor to JP Morgan Chase Bank, Not Individually But Solely as Trustee for the Holder of
25 the Bear Stearns ALT-A Trust 2004-11, Mortgage Pass-Through Certificates, Series 2004-11
26 (“BONY”) and Defendants Stewart Information Services Corp. (“SISC”) and Stewart Title
27 Guaranty Company (“STGC”), by and through their counsel of record, hereby stipulate and agree
28 as follows:

- 1 1. On July 15, 2021, BONY filed its Complaint in Eighth Judicial District Court, Case No.
- 2 A-21-837949-C [ECF No. 1-1];
- 3 2. On August 11, 2021, Defendants filed a Petition for Removal to this Court [ECF No. 1];
- 4 3. On September 10, 2021, BONY filed its Motion for Remand [ECF No. 17];
- 5 4. On September 24, 2021, Defendants filed their Opposition to the Motion for Remand
- 6 [ECF No. 24]
- 7 5. BONY's deadline to respond to Defendants' Opposition to Motion for Remand is
- 8 currently October 1, 2021;
- 9 6. BONY's counsel is requesting a brief extension until Tuesday, October 5, 2021, to file its
- 10 response to the Opposition;
- 11 7. This extension is requested to allow counsel for BONY additional time to review and
- 12 respond to the points and authorities cited to in the pending Motions;
- 13 8. Counsel for Defendants does not oppose the requested extension;

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9. This is the first request for an extension which is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 30th day of September, 2021.
WRIGHT, FINLAY & ZAK, LLP

/s/ Lindsay D. Dragon
Lindsay D. Dragon, Esq.
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7785 W. Sahara Ave., Suite 200
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*Attorneys for Plaintiff, The Bank of New York
Mellon F/K/A The Bank of New York as
Successor to JP Morgan Chase Bank, Not
Individually But Solely as Trustee for the
Holder of the Bear Stearns ALT-A Trust 2004-
11, Mortgage Pass-Through Certificates,
Series 2004-11*

DATED this 30th day of September, 2021.
MAURICE WOOD

/s/ Brittany Wood
Brittany Wood, Esq.
Nevada Bar No. 7562
8250 West Charleston Blvd., Suite 100
Las Vegas, Nevada 89117
*Attorney for Defendants Stewart
Information Services Corp. and Stewart
Title Guaranty Company*

IT IS SO ORDERED.

DATED this 5th day of October, 2021.


RICHARD E. BOULWARE, II
United States District Court